

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AT&T Communications of Illinois, Inc.,)	
TCG Illinois and TCG Chicago)	
)	
Petition for Arbitration of Interconnection Rates)	03-0239
Terms and Conditions and Related Arrangements)	
With Illinois Bell Telephone Company d/b/a SBC)	
Illinois Pursuant to Section 252(b) of the)	
Telecommunications Act of 1996)	

DIRECT TESTIMONY

OF

LANCE McNIEL

ON BEHALF OF

SBC ILLINOIS

EXHIBIT 5.0

Dated: May 20, 2003

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CA. NO. 03-0239
SBC II 5-0
Lance McNeil
6/18/03

ISSUE
OSS #2 & UNE #18

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Lance McNiel. My business address is Three SBC Plaza, 308 South
4 Akard, Room No. 1420.G2, Dallas, Texas 75202.

5 **Q. BY WHOM ARE YOU EMPLOYED?**

6 A. SBC Southwestern Bell Telephone Company (SWBT).

7 **Q. PLEASE DESCRIBE YOUR CURRENT JOB RESPONSIBILITIES.**

8 A. I am the Area Manager-OSS Regulatory Relations. In this position, I am
9 responsible for addressing regulatory matters related to Competitive Local
10 Exchange Carriers' (CLECs) use of SBC local telephone companies' Operational
11 Support Systems (OSS).

12 **Q. WHAT IS YOUR EDUCATIONAL AND PROFESSIONAL**
13 **BACKGROUND?**

14 A. I received a Bachelor of Business Administration degree with a Marketing Major
15 in 1992 from Texas Wesleyan University in Fort Worth, Texas. Prior to coming
16 to SBC, I was employed by Catalyst Construction as a Purchasing Manager. I
17 began working for SWBT in June of 1997, as a Service Representative in the
18 Local Service Center ("LSC"). I was promoted to the position of Manager LSC
19 in October 1999, handling Residence, Simple Business, and Coin Resale. Shortly
20 thereafter, I was given the responsibility for handling Digital Subscriber Line
21 ("DSL"). I remained in that capacity until I was promoted to my current position
22 in June 2001.

23 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

24 A. SBC Illinois.

25 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

26 A. To explain SBC Illinois' position on OSS Issue 2 ("As Is" migrations) and UNE
27 Issue 18 (a) ("Versioning"). I also respond to the testimony of AT&T witness
28 Rebecca Webber on these issues. On OSS Issue 2, I explain that the Commission
29 has already considered and rejected AT&T's arguments in Docket 01-0662 (the
30 271 docket) and those arguments should be rejected again in this docket. On
31 UNE Issue 18(a), again, the Commission has recently rejected AT&T's arguments
32 in Docket 01-0662 and they should be rejected here.

33

34

35 **OSS ISSUE #2: Should AT&T be required to specify features or functionalities**
36 **on UNE-P migration orders or should AT&T be able to**
37 **indicate 'as is' on UNE-P migration orders through a standard**
38 **indicator on the orders?**
39

40 **Q. WHAT IS THE ISSUE?**

41 A. This issue involves an ordering process for the Unbundled Network Elements
42 Platform ("UNE P"). Under existing practice, CLECs specify the particular
43 features on the UNE P they wish to have from SBC Illinois. For example, if the
44 CLEC wins an end user that has Caller ID service, the CLEC tells SBC Illinois on
45 the order form that it wants UNE-P service and that it wants SBC Illinois to
46 activate the Caller ID feature for that end user. In this way, a CLEC has the ability
47 to migrate UNE-P services from another provider to itself and maintain all of the
48 specific features that are currently on that end user's account. AT&T wants to
49 change this practice by requiring SBC Illinois to accept Local Service Requests
50 ("LSRs") for UNE P migrations that do not identify the specific services that

AT&T is ordering, and instead simply indicate "as is" on the LSR. It is AT&T's position that SBC Illinois should then be responsible for figuring out exactly what features should be activated for AT&T's customer.

Q. WHAT IS THE COMPETING LANGUAGE?

A. SBC Illinois is proposing the following contract language for Article 33, Section 5.14:

SBC-AMERITECH will utilize industry guidelines to develop and implement ordering requirements to allow AT&T to send an LSR utilizing LSOG 5 (and future LSOG releases) **for Unbundled Network Element Platform conversions (which includes unbundled switch port and unbundled loop). This will allow AT&T to design their network using ILEC facilities by ordering specific unbundled network elements by specifying the features or functionality on their order so that their customer when converted has the same functionality (or "as is") as they did prior to the migration.**

The bold-faced language in the above text is the contract language proposed by SBC Illinois but not accepted by AT&T.

AT&T is proposing the following language:

5.14 SBC-AMERITECH will utilize industry guidelines to develop and implement ordering requirements to allow AT&T to send an LSR utilizing LSOG 5 (and future LSOG releases) **for these conversions without specifying the features or functionality that was previously being provided by SBC-AMERITECH, AT&T or any CLEC using SBC-Ameritech resale or UNE-P services (i.e. a UNE-P "as-is" LSR utilizing an ACT of "W"), as required by the Illinois Public Utilities Act, Section 13.801.**

The bold-faced, underlined language in the above text is the contract language proposed by AT&T.

82 **Q. WHY IS SBC ILLINOIS' LANGUAGE REASONABLE?**

83 A. SBC's process for "as specified" UNE P migrations is being used today by all
84 CLECs and it works. CLECs have been very successful in the marketplace using
85 UNE-P and, in fact, in the state of Illinois, had a total of 756,094 UNE P lines in
86 service as of April 2003.

87 **Q. WHAT IS SBC ILLINOIS' POSITION ON AT&T'S REQUEST TO**
88 **CHANGE CURRENT PRACTICE?**
89

90 A. SBC Illinois opposes this request for several reasons. First, as a matter of good
91 business practice, CLECs should specifically identify the services that they wish
92 to purchase from SBC Illinois. AT&T's proposal is the equivalent of going to a
93 restaurant and telling the waiter that you'll have the same thing as the person
94 sitting next to you. When a customer (e.g. AT&T) orders that way, it cannot be
95 exactly sure that it is getting what it wants and the waiter (e.g., SBC Illinois) has
96 absolutely no way of knowing if the customer is getting what he really wants.
97 Second, providing "as is" ordering as requested by AT&T would involve major
98 system modifications which would require substantial time and resources, as well
99 as rescheduling of other pending OSS enhancements agreed upon by the CLEC
100 community. Third, AT&T's position was recently considered and rejected by the
101 Commission in Docket 01-0662, the 271 docket.

102

102 **Q. PLEASE ELABORATE ON YOUR FIRST POINT CONCERNING GOOD**
103 **BUSINESS PRACTICES.**
104

105 A. As a matter of good business practice, CLECs should specify the unbundled
106 network elements they wish to have included in their UNE-P arrangements. This
107 process ensures that CLECs know and understand exactly what they have ordered,
108 and it avoids future misunderstandings over what unbundled network elements
109 were requested and what network elements were actually being provided (and
110 billed).

111
112 Unbundled Network Elements, including UNE P, are “modular” in nature and
113 allow CLECs to build their own networks and order the specific pieces of the
114 network that they need. This may include an unbundled loop, a switch port, and
115 switch-based features such as Call Waiting and Three-Way Calling. It is solely
116 up to the CLEC to decide which UNEs they need to complete their network or the
117 particular UNE functionality on an account that they want to offer their customer.
118 SBC Illinois does not know what capabilities a CLEC is willing or able to support
119 with its network.

120
121 Moreover, SBC Illinois may not know what additional services the CLEC has
122 elected to provide its customer via its own network. CLECs make third party
123 arrangements for voicemail (which is not part of the UNE-P) and the requesting
124 CLEC may not know what style or type of voicemail the previous CLEC offered
125 the customer. For example, in order to make a voicemail service operable,

CLECs need to order switch-based features such as Call Forward Busy/No Answer. A set of switch-based features that allow one type of voicemail to work may not allow a different type of voicemail to work. If a CLEC in this situation assumes they can just submit an "as is" order and get everything they want, they will be seriously mistaken.

Q. UNDER YOUR PROPOSAL, WOULD A CLEC HAVE TO IDENTIFY EACH SPECIFIC UNE (E.G. LOOP AND SWITCH PORT) WITHIN A UNE-P ORDER?

A. No. A CLEC can simply order that an existing service be migrated to it as a combination of existing elements in the form of a UNE-P, and SBC Illinois will do that. There is no need for the CLEC to separately identify the loop and switch port that make up a UNE-P. SBC Illinois does not dispute here the CLEC's ability to order a loop and switch port as a single combined UNE called UNE-P. As a practical matter, then, this dispute focuses on the CLECs need to identify features of the UNE-P, such as Call Waiting, Call Forwarding and presubscription to a particular IXC.

Q. PLEASE ELABORATE ON YOUR SECOND POINT, REGARDING SYSTEM MODIFICATIONS.

A. Before discussing the substantial system modifications that would be required to implement AT&T's proposal, I need to point out that SBC Illinois implemented existing ordering systems pursuant to processes that were agreed upon in industry collaboratives. CLECs have built their systems to work within this process. This

process was discussed many times during the Plan of Record ("POR") collaboratives initiated pursuant to the Merger Order in Docket 99-0555. CLECs also had the opportunity to raise concerns about this issue prior to SBC concluding its Uniform & Enhanced Plan of Record ("UPOR") initiated pursuant to the FCC's order in the Ameritech /SBC Merger proceeding, FCC Docket No. 98-141 and its Illinois POR collaboration and implementation. SBC Illinois designed and built its systems based on the outcome of the negotiations and collaborations to satisfy the entire CLEC community. AT&T's proposal would require SBC Illinois (and indeed, all of SBC Midwest) to redesign its OSS processes and to modify its OSS systems. This massive change would not only have large scale financial impacts, but also far reaching and negative impacts to other processes, such as flow through. Until these system modifications could be made, these orders would be dropped to the Local Service Center ("LSC") for manual handling. This interim period of manual processing would degrade order flow through and trigger increased expense to SBC Illinois in performance measurement penalties and in increased work force to perform the manual processes.

Q. PLEASE ELABORATE ON THE SYSTEM MODIFICATIONS YOU REFER TO.

The amount of software design work involved in creating an accurate "as is" process of the type requested by AT&T would be substantial. The necessary system modifications would involve two distinct components: order acceptance

and flow through. Order acceptance would be required to insure that the front end (ordering) and back office (provisioning and billing) systems could read and accept the new order type. Flow-through would insure that the service order would be mechanized from receipt of the electronic Local Service Request ("LSR"). Flow through refers to the ILEC's receipt of an LSR electronically through its gateway, the mechanical creation of a service order without manual intervention (i.e., without additional human intervention once the LSR is submitted into the system) and the passing on of the order to its downstream provisioning and billing systems. This is a complex, contentious process that is closely monitored by performance measures that carry with them substantial penalties for failure to meet certain performance benchmarks. Without flow-through, CLECs would submit a mechanized order, but the actual order processing would be manual. This is neither efficient nor cost effective. The more complicated an order is (and UNE-P without the CLEC's specification of UNE elements would be complicated), the more likely it is that manual processing would be required.

Q. DO YOU HAVE ANY IDEA HOW MUCH TIME AND MONEY IT WOULD TAKE TO IMPLEMENT AT&T'S PROPOSAL?

A. No, I don't. All I can say is that the changes would be very extensive and expensive.

197 **Q. WOULD THE REQUIRED SYSTEM MODIFICATIONS CAUSE OTHER**
198 **PROBLEMS?**
199

200 A. CLECs have historically opposed manual processing very strongly. For example,
201 as part of the Illinois POR, they demanded a 24-month flow-through improvement
202 plan. SBC Illinois and the CLECs operating in the SBC Midwest region jointly
203 agreed to that plan, and SBC is now implementing it. The plan includes many
204 items deemed critical by the CLECs to flow-through. Altering current systems
205 (LSOG 4 and 5) to accommodate AT&T's "as is" ordering demand would prevent
206 timely completion of the flow-through improvement plan.

207 SBC Illinois already provides the ability to order UNE-P conversions and
208 maintain the same features/functionality that are on the current customer account.
209 In fact, both the CLECs' and SBC's Illinois' systems and processes already
210 support successful ordering of UNE-P conversions. SBC Illinois' should not be
211 required to incur additional costs to modify its processes and systems in order to
212 offer another way of ordering UNE-P conversions.

213 **Q. ARE YOU AWARE OF ANY REASON WHY A CLEC WOULD BE**
214 **RELUCTANT TO USE THE "AS IS" ORDERING CAPABILITY IF IT**
215 **WAS AVAILABLE?**
216

217 A. If a CLEC was not already the end user's inter-exchange carrier and submitted an
218 "as is" migration order, then it would still not be the inter-exchange carrier upon
219 completion. It would then be necessary for the CLEC to submit a second order to
220 change the end user's carrier. Experience shows that most CLECs do change the
221 inter-exchange carrier information with the migration order.

222 **Q. WITH RESPECT TO YOUR THIRD POINT, PLEASE EXPLAIN YOUR**
223 **STATEMENT THAT THE COMMISSION HAS ALREADY RULED**
224 **AGAINST AT&T ON THIS ISSUE.**
225

226 A. In Docket 01-0662 (the SBC Illinois 271 investigation), AT&T argued that SBC
227 Illinois should be denied a positive recommendation from the Illinois Commerce
228 Commission because it did not comply with state law. Among the issues of
229 alleged non-compliance raised by AT&T was the claim that SBC Illinois was
230 required by Section 13-801(d)(6) of the Public Utilities Act to provide an “as is”
231 ordering process. This section of the law provides, in relevant part, that:

232 A requesting telecommunications carrier may order the network element
233 platform *as is* for an end user that has such existing local exchange service
234 without changing any of the features previously elected by the end user.”
235 220 ILCS 5/13-801(d)(6) (emphasis added).
236

237 SBC Illinois explained that Section 13-801(d)(6) does not mandate the use of any
238 particular order form, but simply refers to the substantive provisioning of the end
239 user’s existing features. SBC Illinois pointed out that the statute does not say that
240 CLECs have no obligation to identify the features an end user is using. SBC
241 Illinois further explained that it satisfies the requirement of Section 13-801 (d)(6)
242 by allowing CLECs to obtain the UNE-P without changing any of the end user’s
243 features, and that the efficacy of this process is shown by the vast number of
244 UNE-P lines that CLECs had in Illinois – over 335,000 at the time (Summer of
245 2002).

246 The Commission found in favor of SBC Illinois and ruled that Section 13-
247 801(d)(6) does not require the “as is” ordering AT&T advocates in this case. The
248 Commission stated:

We are not persuaded by AT&T assertions that, SBC Illinois is statutorily "required" to develop and implement new ordering and processing capabilities that would allow AT&T to check some type of "as is" box on a UNE-P migration form, without specifying the particular services an end user is receiving. On the evidence and arguments here made, we do not find a state compliance issue to have been shown.

Docket 01-0662, Order On Investigation, issued May 13, 2003, ¶3183. The Commission should reach the same result in this docket.

Q. DOES THE FCC REQUIRE THE TYPE OF "AS IS" ORDERING THAT AT&T SEEKS, AS MS. WEBBER CLAIMS ON PAGE 13 OF HER TESTIMONY?

A. No, and the Commission's Order in Docket 01-0662 specifically says this in paragraphs 763-765:

763. The issue is whether Section 13-801(d)(6) of the PUA requires SBC-Illinois to provide a type of form or process allowing a CLEC to indicate a migration just "as is" without confirming all of the specifics of that migration. In its exceptions brief, AT&T asks that we consider this OSS issue in Phase I of this proceeding.

764. According to SBC-Illinois, however, AT&T has failed to show how its allegations are relevant to the federal checklist. SBC-Illinois points out that the FCC recently approved Qwest's application for nine states, and Qwest (like SBC Illinois), does not use an order form with an "as is" box; rather, Qwest requires CLECs to specify the existing features they wish to retain. Qwest Nine-State Order, ¶¶ 58, 89. As such, the Company asserts that AT&T is only and improperly seeking to expand the requirements of state law.

765. To be sure, AT&T points to nothing in the 1996 Act or the FCC's rules to support its claim that checklist item 2 requires an ILEC to develop the kind of ordering process that AT&T seeks. Thus, our discussion and analysis of this issue is properly deferred to the public interest section reviewing state law matters. See Part IV of this Order.

283 **Q. DOES OSS ISSUE 2 HAVE ANY EFFECT ON A NEW UNE-P ORDERED**
284 **BY A CLEC?**
285

286 A. No. In the case of new UNE-P, the CLEC specifies exactly which features it
287 wants from SBC Illinois. This works fine for new UNE-P, and it should continue
288 to be the way orders for migration of existing UNE-P are given to SBC Illinois.
289

290 **Q. AT&T SAYS THAT ITS PROPOSAL IS BETTER FROM THE**
291 **PERSPECTIVE OF THE END USER. HOW DO YOU RESPOND?**
292

293 A. I think end users benefit from an established ordering process, and would
294 therefore be better off under SBC Illinois' proposal. AT&T's proposal requires
295 changes which create the potential for unnecessary end user delay and
296 complications. I also think that end users benefit when CLECs specify the exact
297 features they want to have provisioned on a line, because this reduces confusion
298 and uncertainty between SBC Illinois and CLECs.
299

300 **Q. AT&T CLAIMS THAT IT HAS PROBLEMS WITH THE ACCURACY OF**
301 **CUSTOMER SERVICE RECORDS ("CSRS"). HOW DO YOU**
302 **RESPOND?**
303

304 A. BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Exception
305 128 as part of the Third Party Operations Support Systems ("OSS") testing on
306 June 20, 2002, stating that they had observed instances where SBC has failed to
307 accurately update the Customer Service Inquiry ("CSI") records. In the 271
308 proceeding (Docket No. 01-0662) SBC Illinois filed a Customer Service Inquiry

309 Accuracy Plan to remedy the primary cause of CSR inaccuracies -- errors in
310 manual handling of LSRs.

311 This improvement plan details SBC Illinois' commitment to correcting this
312 problem. The plan includes the development and delivery of a quality awareness
313 training package to the hundreds of SBC service representatives that handle
314 CLEC service orders. Additionally, it calls for the implementation of a service
315 order quality review process consisting of reviews of daily production service
316 orders, corrections of identified errors, and coaching and/or process/system
317 improvements based on data gathered from the review process.

318
319 I should also note that SBC Illinois has at least two other powerful incentives to
320 maintain accurate customer service records. First, the performance remedy plan
321 measures the accuracy of information posted to the customer service record from
322 the service order and SBC Illinois is subject to substantial penalties if its
323 performance falls below certain benchmarks. Second, SBC Illinois uses these
324 same customer service records to provide service to its retail customers. In
325 short, the CSR issue is being fully addressed and is not a reason to abandon the
326 current "as specified" ordering system.

327 **Q. IN ANY EVENT, DO INACCURATE CUSTOMER SERVICE RECORDS**
328 **JUSTIFY THE "AS IS" ORDERING PROCESS, AS MS. WEBBER**
329 **SUGGESTS?**
330

331 **A.** No. Under the "as is" process AT&T proposes, the system would look at the CSR
332 to determine which features to provision on an end user's line. Any errors on the

333 CSR would, therefore, be reflected in the service that was provisioned under the
334 “as is” scenario AT&T proposes.

335
336 **Q. MS WEBBER DISCUSSES SOME SITUATIONS WHERE AT&T WOULD**
337 **PREFER “AS IS” ORDERING. CAN YOU RESPOND?**
338

339 A. Ms Webber points to an exaggerated process which AT&T service representatives
340 must go through to verify feature availability and the associated Universal Service
341 Order Codes (USOCs). In fact, a CLEC need only look at the feature availability
342 function in SBC’s preorder system, Enhanced Verigate, to see the features
343 available in a particular switch and their respective USOCs in one easy step. In
344 other words, recent system enhancements have made it even easier for CLECs to
345 submit “as specified” orders.

346
347 **Q. DOES THE CURRENT AT&T/SBC ILLINOIS INTERCONNECTION**
348 **AGREEMENT PROVIDE FOR “AS IS” ORDERING, AS MS. WEBBER**
349 **SUGGESTS ON PAGE 16 OF HER TESTIMONY?**
350

351 A. No, it does not. Ms Webber’s testimony is incorrect because the language she
352 quotes, “...so that they can be ordered and provisioned as a Combination and
353 shall not require the enumeration of each Network Element within that
354 Combination on each provisioning order”, is addressing ordering combinations of
355 network elements, e.g. UNE P, in lieu of ordering UNE Loop and UNE Port
356 separately. The language merely states that the CLEC can order a UNE
357 combination and not be required to enumerate each underlying network element
358 within that combination. In other words, if AT&T wants to order a UNE Loop

and Port combination, this language indicates they can order the UNE P combination instead of ordering the port and loop separately. In fact, the language contradicts Ms Webber in that it goes on to state "...AT&T shall specify on each order the type of service to be provided...."

Q. HOW SHOULD THE COMMISSION RULE ON THIS ISSUE?

A. The Commission should accept SBC Illinois' language.

UNE ISSUE 18: SBC Illinois: Whether SBC is obligated to modify its OSS to accommodate AT&T and its third party agent and their inter-CLEC communication to enable the High bandwidth service supplier (HBSS) to place orders on AT&T's behalf for Line Splitting.

AT&T: Should AT&T and its HBSS be required to be on the same LSOG version?

Q. WHAT IS THE ISSUE BETWEEN THE PARTIES?

A. AT&T claims that the "versioning" of SBC Illinois' operation support systems ("OSS") interferes with its ability to jointly provision data services with other CLECs. In fact, "versioning" is something that SBC Illinois has implemented at the request of CLECs and for the benefit of CLECs. With the current OSS deployed by SBC Illinois, there are substantial technical impediments to doing what AT&T requests. Fortunately, AT&T has several options available to it accomplish the business objectives it discusses in its testimony – so no change in "versioning" is required.

385 Q. WHAT IS VERSIONING?

386 A. At the insistence of CLECs (and against its own wishes) SBC modified its
387 operations support systems ("OSS") to allow "versioning", i.e., it simultaneously
388 supports as many as three different versions of OSS so that CLECs do not have to
389 always use the latest OSS version. For example, as of May 20, 2003 SBC Illinois
390 supports Local Service Ordering Requirements (LSOR) version 4.02, LSOR 5.02
391 and LSOR 5.03, so any CLEC that built interfaces based on LSOR 5.0 does not
392 have to immediately update that interface as soon as the next generation of
393 software is deployed to satisfy CLEC requirements for new and improved
394 functionality.

395 Q. WHAT IS THE COMPETING LANGUAGE FOR SCHEDULE 9.2.2,
396 SECTION 9.2.2.5.1?
397

398 A. SBC Illinois' is proposing the following language:

399 Use of High Bandwidth Services Supplier. AT&T may identify
400 one or more CLECs as an authorized High Bandwidth Service
401 Supplier ("HBSS"), authorized by AT&T to add, change or delete
402 High Bandwidth Services capabilities on a xDSL-capable Loop
403 employed or ordered by AT&T. If AT&T chooses to utilize
404 HBSSs under this section, the orders issued by the HBSS must
405 appear, in all ways, as if the orders were submitted by AT&T. For
406 orders submitted under this Schedule 9.2.2, SBC-AMERITECH
407 will treat the order in exactly the same manner as if AT&T, and not
408 a third party, submitted the order.
409

410 AT&T's is proposing the following language:

411 Use of High Bandwidth Services Supplier. AT&T may identify
412 one or more CLECs as an authorized High Bandwidth Service
413 Supplier ("HBSS"), authorized by AT&T to add, change or delete
414 High Bandwidth Services capabilities on a xDSL-capable Loop
415 employed or ordered by AT&T. If AT&T chooses to utilize
416 HBSSs under this section, the orders issued by the HBSS must
417 appear, in all ways, as if the orders were submitted by AT&T. For

orders submitted under this **Schedule 9.2.2**, SBC-AMERITECH will treat the order in exactly the same manner as if AT&T, and not a third party, submitted the order. **Provided, however, that AT&T and the HBSS are not required to be on the same LSOG version.**

Q. WAS VERSIONING DEVELOPED TO IMPEDE CLECS?

A. No, to the contrary, it was developed to assist them. SBC and the CLEC community negotiated "versioning" during the collaboratives for the 13-State Change Management Process (CMP). The versioning solution (in which SBC agreed to maintain multiple versions of OSS) was carried over into the POR collaboratives. SBC began implementing the agreed upon versioning scheme in August of 2000. SBC spent a great deal of time and money implementing versioning, and moreover, implemented exactly what the CLEC's, including AT&T, requested.

In supporting multiple versions of OSS, SBC must have a method of determining the identity of the CLEC and the version the CLEC is using in order to know how to apply the appropriate "edits". An "edit" is the set of business rules that apply to a particular OSS version. For example, a CLEC may have to fill in a certain field when it submits an order under LSOR 4.02, but may not fill in that field if it submits the same order under LSOR 5.02. Orders that are improperly submitted are rejected and cause CLECs a great deal of concern. The edits, or business rules, that apply to each version of OSS are therefore terribly important, and it is vital that SBC Illinois applies the correct edits.

443 When SBC developed its versioning architecture, the operating company number
444 ("OCN") was selected as the most logical choice to identify the CLEC because
445 the Access Carrier Name Abbreviation ("ACNA") level is not specific enough
446 (customers could have multiple platforms) and because the EDI translator, which
447 uses the Trading Partner ID, was not designed to do editing, but rather to pass the
448 order to the Local Access Service Request ("LASR") application where the
449 editing intelligence resides. Therefore, SBC was looking for something that
450 LASR could utilize for purposes of applying the appropriate edits. The OCN was
451 the logical choice because it comes across on the local service request, is unique
452 to the CLEC entity and allows CLECs with multiple OCNs to operate on different
453 platforms. SBC perceived the OCN as offering the most flexibility to the CLECs.

454
455 **Q. WHAT IS AT&T'S CONCERN?**

456 A. AT&T is seeking a way for a third party CLEC (in this case Covad) to submit
457 orders on its behalf to establish Line Splitting for an existing AT&T voice
458 customer. SBC Illinois has absolutely no problem with this type of cooperation
459 between CLECs, and in fact has assisted AT&T by agreeing that it would treat an
460 order submitted by Covad as if it were submitted directly by AT&T itself as long
461 as it looked like an AT&T order to SBC Illinois system. Moreover, in order to
462 further facilitate this arrangement, SBC Illinois has agreed that it would provide
463 acknowledgements of its receipt of the order directly to Covad, rather than to
464 AT&T. In order for this to work, however, AT&T and Covad must be on the
465 same "version" of OSS. Otherwise, the SBC Illinois OSS will detect a difference

between AT&T and Covad and the orders and acknowledgements will not flow seamlessly between the three parties.

Q. HAS SBC ILLINOIS WORKED WITH AT&T TO COME UP WITH AN ALTERNATIVE WAY THAT AT&T AND COVAD CAN SUBMIT ORDERS TOGETHER?

A. Absolutely. SBC Illinois has presented at least three alternatives. First, local service requests ("LSRs") could be submitted via the GUI interface, WebLEX, and AT&T could provide Covad with an AT&T User ID that AT&T assigns from its Common Block ID. This would allow AT&T to know exactly which of its partnering CLECs (AT&T calls them high bandwidth service suppliers or "HBSSs") it has authorized to access AT&T's data in SBC's OSS. AT&T would also provide Covad with any necessary codes (OCN, ACNA, etc) for the Covad service representatives to be able to place AT&T's orders. Each order would appear to SBC as if it were an AT&T LSR submitted by AT&T. This approach would also allow both AT&T and Covad the ability to view the LSRs and response notifications from SBC Illinois such as rejects, firm order confirmations, jeopardy notices and service order completion information. This approach would not require AT&T and Covad to be on the same LSOR version because by default, SBC's GUI interface only supports the latest LSOR version.

488 **Q. WHAT IS THE SECOND ALTERNATIVE?**

489 A. The second option is LSR submission via Electronic Data Interchange ("EDI") or
490 Common Object Request Broker Architecture ("CORBA"). With this option, the
491 LSOR version is an issue. The main concern is who would get the response
492 notifications (e.g. reject notices). For example, if AT&T wants Covad to handle
493 order activity on its behalf, and AT&T wants to continue to receive the
494 notifications, then AT&T could provide Covad with the necessary AT&T codes
495 including an AT&T TPID. This way AT&T would receive the notifications that
496 are transmitted based on the TPID submitted on the order. If however, AT&T
497 prefers that Covad receive the notifications, then AT&T could advise Covad to
498 use all of AT&T's codes except for TPID. This would cause the EDI translator to
499 route the LASR notifications to Covad.

500 **Q. WHAT IS THE THIRD ALTERNATIVE?**

501 A. Because AT&T's issue is purely a processing issue for AT&T and Covad, Covad
502 could program its EDI to process AT&T orders via the version of the LSOR that
503 AT&T is on and transmit them via one TPID. Then Covad would be able to
504 process its own order activity via its version of the LSOR and transmit those over
505 one of its other TPIDs.

506 **Q. AT&T SAYS THAT A NOTHER ALTERNATIVE EXISTS, INVOLVING**
507 **LSP AUTHORIZATIONS. WHAT IS THIS?**
508

509 A. The versioning issue raised by AT&T was thoroughly discussed at the April 3,
510 2003 change management process ("CMP") meeting. As described by Ms
511 Webber, SBC suggested that the issue raised by AT&T would most effectively be

512 addressed through an agency arrangement, whereby the local service request
513 would be modified in a manner that would allow a third party to submit orders on
514 behalf of a CLEC, using a different LSOR version than that used by the CLEC.
515 This proposal could be implemented without any changes to SBC's versioning
516 model, and would directly address AT&T's concern by allowing Covad to submit
517 orders on behalf of AT&T using a LSOR version not used by AT&T. Based on
518 this discussion, all CLECs attending the meeting (including AT&T) agreed that
519 the issue of third-party ordering should be addressed in the CMP.

520
521 During the May 8, 2003 CMP meeting, SBC and the CLECs agreed that a joint
522 effort should be undertaken to ensure that any changes to the ordering process
523 designed to facilitate CLEC third-party agency arrangements meets the needs of
524 all participants. In order to facilitate this effort, SBC agreed to host a series of
525 working sessions with the CLECs to complete the Business Process flows and
526 subsequent requirements. The first working session is scheduled for May 29,
527 2003.

528
529 It is important to note, however, that this change will require coding changes to
530 SBC Illinois system, and therefore will not be made immediately. Also, SBC is
531 working with the CLECs to identify all of the partnership possibilities.

532

532 **Q. WHAT DO YOU CONCLUDE FROM THESE RECENT MEETINGS?**

533 A. That this issue is being actively and productively addressed in industry
534 collaboratives and that the industry should be permitted to work this issue out in a
535 cooperative manner. The Commission should not pre-empt this process by
536 adopting AT&T's language.

537

538 **Q. HAS THE COMMISSION EXAMINED THIS ISSUE BEFORE?**

539 A. Yes, just recently in Docket 01-0662. There, AT&T raised the same arguments it
540 is raising here and complained that SBC Illinois "versioning" policy unfairly
541 harmed its ability to compete. The Commission rejected this argument. Docket
542 01-0662, Order On Investigation, issued May 13, 2003, ¶1726. The Commission
543 should reach the same conclusion in this case.

544

545 **Q. HOW SHOULD THE COMMISSION RULE ON UNE ISSUE 18(A)?**

546 A. AT&T's language would be extremely difficult to implement and would
547 undermine the industry's established approach to dealing with multiple OSS
548 versions. SBC Illinois language, on the other hand, is entirely consistent with the
549 versioning process and with recent Commission authority. For these reasons, the
550 Commission should order the parties to include SBC Illinois' proposed language
551 for Schedule 9.2.2, section 9.2.2.5.1 in their agreement.

552

553 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

554 A. Yes.

555

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AT&T Communications of Illinois, Inc.)
TCG Illinois and TCG Chicago)
)
Petition for Arbitration of Interconnection Rates,)
Terms and Conditions and Related Arrangements)
With Illinois Bell Telephone Company d/b/a)
SBC Illinois Pursuant to Section 252(b))
of the Telecommunications Act of 1996)

Docket No. 03-0239

VERIFICATION

Lance E. McNiel, being first duly sworn on oath, deposes and states the following:

1. I am the area Manager – OSS Regulatory Relations for SBC.
2. The facts set forth and statements made in my foregoing Direct and Rebuttal

Testimony are true and correct to the best of my knowledge, information and belief.

3. Further affiant saith not.


Lance E. McNiel

STATE OF TEXAS
COUNTY OF DALLAS

Subscribed and sworn to
before me, this 13th day of
June 2003


Notary Public

